

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	)	<b>Bankruptcy No. 19-23079-JAD</b>
<b>ANGELA M. SIMONE,</b>	)	
<b>aka ANGELA MAMMARELLI SIMONE)</b>	)	<b>Chapter 13</b>
<b>dba VICTOR VICTORIA HAIR ETC.</b>	)	
	)	
<b>Debtor(s)</b>	)	<b>Doc. No. _____</b>
	)	
<b>ANGELA M. SIMONE,</b>	)	
<b>aka ANGELA MAMMARELLI SIMONE)</b>	)	
	)	
<b>Movant(s)</b>	)	
	)	
<b>v.</b>	)	
<b>No Respondents</b>	)	

**MOTION TO APPROVE FINANCING FOR REPAIRS TO REAL ESTATE THROUGH  
COLDWELL BANKER REALVITALIZE PROGRAM**

AND NOW comes, Angela M. Simone, by and through her counsel, Jeffrey J. Sikirica, Esquire, and hereby files the Motion to Approve Financing for Repairs to Real Estate through Coldwell Banker RealVitalize Program,” stating in support thereof as follows:

1. Angela M. Simone (hereinafter “Debtor”) commenced this case by filing a Voluntary Petition for Relief under Chapter 13 of the United States Bankruptcy Code on August 3, 2019.
2. Debtor is the owner of real estate located at 1030 Meridian Drive, Presto, PA 15142 (hereinafter the “Real Estate”).
3. The Real Estate is located in the Nevillewood Subdivision in Collier Township and it is very near the clubhouse for the Nevillewood golf course.
4. The Real Estate had been previously rented out by the Debtor. The prior renter caused significant damage to the interior of the Real estate.

5. The Debtor originally listed the value of the Real Estate as \$675,000.00 on her bankruptcy schedules. After having a real estate agent from Coldwell banker view the property the agent believes the property would have a significantly higher value if certain repairs were made. The real estate agent also advised that the Real Estate would have to be significantly discounted if sold in its current condition.

6. Debtor has previously retained Special Counsel to contest a will of her late mother in order to generate funds to repair the property. At this time there has been no resolution of the matter.

7. The Debtor has received estimates to make repairs and at a minimum at least \$18,500.00 is required.

8. The Debtor concurrent with this Motion has filed to retain a real estate broker from Coldwell Banker.

9. Coldwell Bank offers a program in which they will advance up to the amount of the listing side of the real estate commission which in this case is 2.5% for pre-sale repairs to the Real Estate. Repayment of the advance would be paid at the sale closing.

10. The Debtor is seeking approval to enter into the RealVitalize Program Participation Agreement with Coldwell Bank in the form as set forth in Exhibit "A" up to an amount not to exceed \$25,000.00.

WHEREFORE, Debtor respectfully prays this Honorable Court authorize or otherwise allow the Debtor to enter into the RealVitalize Program Participation Agreement with Coldwell Bank in the form attached to this Motion for an amount not to exceed \$25,000.00, and for such other relief that is just and proper.

March 4, 2020

Respectfully submitted,

/s/ Jeffrey J. Sikirica  
Jeffrey J. Sikirica, Esquire  
PA. I.D. #36745

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